

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 3 CASES LISTED IN  
EXHIBIT A TO PLAINTIFFS' NOTICE OF  
ADOPTION

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE  
OF THOMAS C. WRIGHT, JR., M.D., FOR WAVE 3**

Plaintiffs filed a Notice of Adoption [Dkt. 2812] in the Wave 3 cases identified in Exhibit A to their Notice adopting their Motion to Exclude the Opinions and Testimony of Thomas C. Wright, Jr., M.D. and Supporting Memorandum from Ethicon Wave 1. Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to Thomas C. Wright, Jr., M.D Ethicon Wave 1, Dkt. #2143. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Additionally, Defendants note that because Plaintiffs adopted their prior Plaintiffs' Amended Memorandum of Law in Support of their Motion to Exclude the Opinions and Testimony of Thomas C. Wright, Jr., M.D., Dkt. #1988, that addresses only Dr. Wright's opinions as they relate to Prolift, there has been no challenge to his opinions specific to TVT.

Dated: October 11, 2016

Respectfully submitted,

/s/ David B. Thomas

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AND JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

*/s/ David B. Thomas*

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